

Dean M. Harvey (SBN 250298)  
Katherine C. Lubin (SBN 259826)  
Michelle A. Lamy (SBN 308174)  
Miriam E. Marks (SBN 332351)  
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP  
275 Battery Street, 29th Floor  
San Francisco, CA 94111  
Telephone: (415) 956-1000  
dharvey@lchb.com  
kbenson@lchb.com  
mlamy@lchb.com  
mmarks@lchb.com

*Interim Class Counsel*

*(Additional counsel listed on signature page)*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE CALIFORNIA BAIL BOND  
ANTITRUST LITIGATION

Case No. 4:19-cv-00717-JST

CLASS ACTION

This Document Relates To:

ALL ACTIONS

**DECLARATION OF DEAN M. HARVEY IN  
SUPPORT OF ADMINISTRATIVE MOTION  
TO CORRECT THE DECLARATION OF  
DARRYL ANDERSON (DKT. 285)**

I, Dean M. Harvey, declare as follows:

1. I am a partner of the law firm Lieff Cabraser Heimann & Bernstein, LLP, which has been appointed Interim Class Counsel in the above-captioned proceeding. I am a member of the State Bar of California. I have personal knowledge of the facts herein and, if called upon to testify to those facts, I could and would do so competently.

2. Attached hereto as **Exhibit A** is a true and correct copy of the document beginning at Bates Number GSBA000002210 and ending at Bates Number GSBA000002210, produced by the Golden State Bail Agents Association ("GSBAA") in this litigation on September 13, 2021.

1                   3.       Attached hereto as **Exhibit B** is a true and correct copy of the document  
2 beginning at Bates Number CBAA000008537 and ending at Bates Number CBAA000008554,  
3 produced by the California Bail Agents Association (“CBAA”) in this litigation on September 25,  
4 2021.

5                   4.       Attached hereto as **Exhibit C** is a true and correct copy of the document  
6 beginning at Bates Number SFAA 000387 and ending at Bates Number SFAA 000690, produced  
7 by the Surety & Fidelity Association of America (“SFAA”) in this litigation on March 4, 2021.

8                   5.       Attached hereto as **Exhibit D** is a true and correct copy of the document  
9 beginning at Bates Number CDI\_000000262 and ending at Bates Number CDI\_000000329,  
10 produced by the California Department of Insurance (“CDI”) in this litigation on February 5,  
11 2021.

12                   6.       In preparing for the oral argument regarding Moving Defendants’ Motion  
13 to Dismiss Plaintiffs’ Third Consolidated Amended Complaint, I discovered that Exhibits 4, 6, 8,  
14 and 10 to the Declaration of Darryl Anderson (ECF Nos. 285-4, 285-6, 285-8, and 285-10,  
15 respectively) were inaccurate and/or incomplete. I then consulted with Lieff Cabraser’s litigation  
16 support professionals, who confirmed that Exhibits 4, 6, 8, and 10 to the Anderson Declaration  
17 were not what they purported to be, and confirmed that Exhibits A, B, C, and D attached hereto  
18 are, respectively, the correct and complete documents produced to Plaintiffs by the  
19 aforementioned entities in this litigation.

20                   7.       After receiving confirmation from Lieff Cabraser’s litigation support  
21 professionals confirming that Exhibit 6 was not what it purported to be, I immediately emailed all  
22 Defense counsel on October 4, 2022, explaining the issue and attaching both the erroneous  
23 document filed at Docket Number 285-6, and the correct document produced with beginning  
24 Bates Number CBAA000008537 and attached as Exhibit B hereto. I asked Defendants to let me  
25 know if any of them opposed Plaintiffs filing the correct document. In response, Defendants  
26 stated that their filing of an incomplete Exhibit 6 was the “result of an oversight,” and confirmed  
27 they do not object to Plaintiffs filing the corrected copy at Exhibit B.  
28

1           8.       Upon receiving confirmation from Lief Cabraser’s litigation support  
2 professionals that Exhibits 4, 8, and 10 were not what they purported to be, I immediately emailed  
3 all Defense counsel again on October 18, 2022, explaining the issues specific to those documents.  
4 In response, Defendants acknowledged that the improper attachment in Exhibit 4 comes from a  
5 separate production, but did not offer any explanation for its inclusion in Exhibit 4. Defendants  
6 also confirmed that Exhibit 8 is not a complete copy of the document produced in this litigation,  
7 and that they excluded pages from the complete document because “they do not believe they have  
8 any bearing on the references in the TAC at paragraph 123.” Defendants also acknowledged that  
9 they had excerpted Exhibit 10. And Defendants again confirmed they do not object to Plaintiffs  
10 filing the correct documents at Exhibits A, C, and D.

11           9.       I declare under penalty of perjury under the laws of the United States that  
12 the foregoing is true and correct.

13  
14                   Executed October 26, 2022 in Kentfield, California.

15                                   /s/ Dean M. Harvey  
16                                   Dean M. Harvey  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28